

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

MIGUEL A. ROCABRUNA,
Plaintiff,

v.

EXPERIAN INFORMATION SOLUTIONS,
INC., TRANS UNION, LLC., and EQUIFAX
INFORMATION SERVICES, LLC,

CIVIL NO. 1:12-CV-00512-LMB-TCB

Defendants.

REPORT OF DISCOVERY PLAN MEETING

1. Pursuant to Fed.R.Civ.P. 26(f), a meeting was held on July 17, 2012, via electronic mail and telephone between:

Kristi C. Kelly and Andrew Guzzo for Plaintiff
M. Kasey Ratliff for Trans Union LLC
David. N. Anthony and Miguel Eaton for Experian Information Solutions, Inc.
Ann Broussard for Equifax Information Services, LLC

2. **Pre-discovery Disclosures.** The Parties do not believe that any changes are necessary to the timing, form, or requirement for disclosures under Rule 26(a) and will exchange by July 31, 2012 the information required by Fed.R.Civ.P. 26(a)(1) and local rule 26.

3. **Trial before a Magistrate Judge.** Plaintiff consents to trial before a Magistrate Judge. The Defendants have not agreed to conduct the trial before a magistrate judge.

4. **Settlement.** The Parties have engaged in preliminary settlement discussions with Plaintiff.

5. **Agreements related to Rule 26(f)(3)(C), and 26(f)(3)(D).** Pursuant to Rule 26(f)(3)(C), the Parties discussed the disclosure of electronically stored information and anticipate entering into an agreement to identify and retain all such relevant information for the duration of the case and produce the information in the most cost effective manner given the type

and volume of information. The Parties' agreement will also address the preservation of non-electronic discoverable information. Pursuant to Rule 26(f)(3)(D), the Parties discussed issues relating to claims of privilege or work product protection and have agreed to produce a privilege log.

6. **Protective Order.** The Parties foresee the need for a protective order governing the dissemination and disclosure of certain documents produced in the case. The Parties agree to work together to submit an agreed upon protective order for entry by the Court.

7. **Delivery of Motions and Pleadings.** The Parties agree that a notice of electronic filing received prior to 5:00 p.m. through the court's PACER system shall be sufficient for both service and delivery of the motion on the date filed.

8. **Discovery Plan.** In accordance with the Court's order of July 5, 2012, the Parties jointly propose to the Court the following discovery plan:

All discovery commenced in time to be completed by October 12, 2012.

Maximum of 30 interrogatories by each party to any other party.

Maximum of 5 non-party, non-expert depositions by Plaintiff and 5 non-party, non-expert depositions by each Defendant. Depositions on written questions shall not count against the five non-party, non-expert depositions.

Each deposition limited to maximum of 7 hours unless extended by agreement of Parties.

Reports from retained experts under Rule 26(a)(2) should be due:

From Plaintiff by September 7, 2012.

From Defendants by October 5, 2012.

The Parties agree to discuss the modification of the disclosure of expert testimony as the circumstance require.

Final lists of witnesses and exhibits under Rule 26(a)(3) should be due:

From Plaintiff on October 18, 2012.

From Defendants on October 18, 2012.

Parties should have 10 days after the final pre-trial conference to note objections under Rule 26(a)(3).

The final pre-trial conference is set for October 18, 2012, at which time a trial will be set. The Parties expect the trial to take approximately two days.

DATED: July 18, 2012

Respectfully submitted,

/s/

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/s/

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CERTIFICATE OF SERVICE

I hereby certify that on the 18 day of July, 2012, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to counsel of record registered to use the CM/ECF system in this action, as follows:

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I further certify that I will cause a copy of the foregoing to be sent to the following non-filing user: None.

/s/

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